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13 | *Attorneys for Defendant Twitter, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

18 BEVERLY NUNES, individually and on behalf ) CASE NO.: 14-cv-02843-VC  
19 of a class of similarly situated individuals, )  
20 Plaintiff, ) **STIPULATION AND [PROPOSED]**  
21 v. ) **ORDER STAYING PROCEEDINGS**  
22 TWITTER, INC., ) **AND MODIFYING CASE**  
23 ) **SCHEDULE**  
24 Defendant. )  
 )  
 )

28 STIPULATION AND [PROPOSED]  
ORDER REGARDING STAY AND SCHEDULE  
CASE NO.: 14-CV-02843-VC

1       On February 24, 2015, the parties in this matter participated in a mediation with the Hon.  
2 Read Ambler, and agreed to further discussions and a further mediation session that is currently  
3 scheduled to be conducted on March 24, 2015. In connection with their ongoing discussions, the  
4 parties have jointly agreed to request a three-month stay of proceedings in this matter, along with  
5 corresponding extensions to the existing case schedule. The parties' agreement and request for a  
6 stay is made in good faith and not for purposes of delay.

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8           THE PARTIES THEREFORE STIPULATE through their undersigned counsel, subject  
9 to the Court's approval, that:

- 10          1.       All proceedings in this matter should be stayed through June 2, 2015;  
11          2.       The existing case schedule should be modified as follows: Phase I Discovery  
12 completed by September 30, 2015; Initial Expert Witness statements shall be submitted  
13 by October 17, 2015; Rebuttal Expert Witness statements shall be submitted by Novem-  
14 ber 3, 2015; Motions for Summary Judgment on Phase 1 to be heard on February 19,  
15 2016 10:00 a.m.

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17 DATE: March 3, 2015

/s/ David H. Kramer

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19           David H. Kramer  
WILSON SONSINI GOODRICH & ROSATI

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***Attorney for Defendant Twitter, Inc.***

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DATE: March 3, 2015

/s/ John G. Jacobs

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23           John G. Jacobs (*PRO HAC VICE*)  
JACOBS KOLTON, CHTD  
Jeffrey F. Keller  
KELLER GROVER, LLP

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***Attorneys for Plaintiff Beverly Nunes***

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28 STIPULATION AND [PROPOSED]  
ORDER REGARDING STAY AND SCHEDULE  
CASE NO.: 14-CV-02843-VC

1 PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS HEREBY  
2 ORDERED THAT:

- 3       1. All proceedings in this matter are stayed through June 2, 2015;  
4       2. The existing case schedule is modified as follows: Phase I Discovery completed  
5                   by September 30, 2015; Initial Expert Witness statements submitted by October  
6                   17, 2015; Rebuttal Expert Witness statements submitted by November 3, 2015;  
7                   Motions for Summary Judgment on Phase 1 to be heard on February 19, 2016  
8                   10:00 a.m.

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10 SIGNED this 5<sup>th</sup> day of March, 2015.



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13 VINCE CHHABRIA  
14 UNITED STATES DISTRICT JUDGE

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